

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 22-342 (SCC)

JULIO M. HERRERA-VELUTINI,

Defendant.

DEFENDANT'S MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW the defendant, Julio M. Herrera-Velutini (“Mr. Herrera” or the “Defendant”), through his undersigned attorneys, who respectfully states and prays as follows:

1. Today, Mr. Herrera will file a motion with accompanying Exhibits A, B, and C, and respectfully requests that the motion and exhibits be accepted by the Court for filing with the following level of restriction: ***Restricted viewing for case participants only (The Government and the Defendants).***

2. Mr. Herrera’s motion is in response to the Government’s motion (Dkt. 639), which was filed under a restricted level, due to “sensitive information.” *See* Dkt 640. Mr. Herrera is filing restricted to maintain consistency in the level of protection.

WHEREFORE, Mr. Herrera respectfully requests that the motion remain sealed under the requested restriction level.

Respectfully submitted in San Juan, Puerto Rico, this 30th day of September, 2024.

DLA Piper (Puerto Rico) LLC

/s/ Sonia I. Torres-Pabón

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this same date we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

In San Juan, Puerto Rico, this 30th day of September, 2024.

/s/ Sonia I. Torres-Pabón
Sonia I. Torres-Pabón